



THE LAW OFFICES OF
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February 3, 2025

VIA ECF

Hon. James B. Clark, III
United States District Court of New Jersey
Court Room MLK 2A
50 Walnut Street
Newark, NJ 07102

Re: Flores v. Paradise Trips, LLC, et al.
Case No.: 2:23-cv-22894-EP-JBC

Dear Judge Clark:

We represent the Plaintiff, Christina Flores in the above-entitled action. We are respectfully writing to the Court in advance of the February 5, 2025 case status conference seeking an extension of the February 28, 2025 fact discovery end date. This would be Plaintiff's first such request which is premised on the following good cause and is with the consent of William Perrelli, Esq., counsel for the defense.

As a result of the accident that is the subject of this litigation, on February 27, 2023, Ms. Flores underwent surgery consisting of a decompressive laminectomy L5; bilateral lateral fusion, L5 to S1; posterior lumbar interbody fusion, L5 to S1; placement of intervertebral cages, L5-S1; placement of pedicle screw rod fixation, L5-S1. The treatment thus far exhausted her \$250,000 "PIP" coverage and she now relies on a Medicaid based insurance plan.

We recently learned that since Mr. Flores has continued to endure pain as a result of the accident, despite the surgery, she has sought and found a physician who accepts Medicaid to implant a spinal cord stimulator ("SCS"). The implantation of an SCS is a three-step process consisting of the following:

1. Step 1 - Trial period where the physician places leads in the epidural space near the spinal cord and connects them to an external stimulator that is carried around the patient's waist, which usually lasts 3–7 days. The trial is deemed successful if more than 50% pain relief is experienced along with improvements in daily function. If successful, patient then proceeds to step 2.
2. Step 2 - Obtaining psychological clearance for an internal SCS. If given psychological clearance, patient may proceed to step 3.

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3. Step 3 – Scheduling and implantation of internal SCS.

Ms. Flores is scheduled for Step 1 on March 11, 2025. We have no idea how long it will take, if Step 1 is successful, to proceed to the next steps. We are at the mercy of the Medicaid bureaucracy and the surgeon's schedule. We are therefore requesting a new fact discovery end date of May 31, 2025. If Step 1 is not successful, we will alert the Court so we can accelerate the discovery end date.

Finally, with respect to the Defendant's Motion for Rule 35 Defense Medical Exams ("DME"), returnable on March 3, 2025. We are also hopeful that we will resolve that motion with counsel without the necessity of court intervention. However, we are respectfully requesting that that the motion be adjourned until after we have a better understanding of Ms. Flores' treatment plan.

Respectfully,

s/ Joseph D. Monaco J.F.F

Joseph D. Monaco, III

Cc: Defense Counsel via ECF